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January 12, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWB-204  
Washington, DC 20554

Re: *Reporting Requirements for U.S. Providers of International Telecommunications Services, IB Docket No. 04-112*

*International Settlements Policy Reform, IB Docket No. 11-80*

*Joint Petition for Rulemaking of AT&T Inc., Sprint Nextel Corporation and Verizon Policy, RM-11322*

*Modifying the Commission's Process to Avert Harm to U.S. Competition and U.S. Customers Caused by Anticompetitive Conduct, IB Docket No. 05-254*

*Petition Pursuant to Rule 64.1002(d) Requesting Issuance of Settlements Stop Payment Order on the US-Tonga Route, IB Docket No. 09-10*

*Review of Foreign Ownership Policies for Common Carriers and Aeronautical Radio Licensees under Section 310(b)(4) of the Communications Act of 1934, as Amended, IB Docket No. 11-133*

Dear Ms. Dortch:

On January 11, 2012, Eric Loeb, James Talbot and I, all of AT&T, met with the following International Bureau staff: James Ball, Linda Blake, Kathleen Collins, Kimberly Cook (via telephone), John Copes, Francis Gutierrez, Cathy Hsu, David Krech, George Li, Linda O'Connell, David Strickland, Troy Tanner, and Mark Uretsky to discuss the above-referenced proceedings. AT&T provided the attached document which served as the basis of our discussion.

In addition, on international reporting, we noted that the need for confidential treatment of U.S. carrier traffic and revenue data is further supported by the use of this data by foreign carriers, as described by Sprint, to identify least cost routing practices by U.S. carriers. Also, in further support of the request in AT&T's comments that the Commission should include only industry data in the traffic and revenue report, we noted that the removal of the International

Settlements Policy from almost all remaining routes, as proposed by the Commission's proceeding on that issue, would also remove any continuing justification for the publication of carrier-specific information in the report.

Additionally, in a separate telephone conversation on January 11, 2012, Mr. Talbot told Mr. Uretsky that AT&T believes that there needs to be some flexibility in any new requirement for the reporting of interconnected VoIP traffic to allow for IP applications and platforms that may not provide call-origination, call-destination or other information.

On International Settlements Policy reform, we also expressed our support, as described in AT&T's comments in the ISP proceeding, for the proposal to apply benchmark requirements to traffic routed via third countries where stop payment orders are applied to address anticompetitive practices, following notice and comment on this issue. We noted that the concerns expressed by Verizon regarding this remedy could be addressed through the notice and comment process. We also emphasized that the proposed requirement for the filing or notification of above-benchmark rate agreements, as proposed in the notice in this proceeding, would not only reverse deregulatory policies that have been in effect for many years and have successfully reduced termination rates to historically low levels, but would also raise difficult and burdensome implementation issues, in view of the highly complex nature of many rate agreements in today's international market.

One electronic copy of this Notice is being submitted in the above-referenced proceedings in accordance with Section 1.1206 of the Commission's rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. Alvarez". The signature is fluid and cursive, with a large, stylized "A" and "L".

cc: James Ball  
Linda Blake  
Kathleen Collins  
Kimberly Cook  
John Copes  
Francis Gutierrez  
Cathy Hsu  
David Krech  
George Li  
Linda O'Connell  
David Strickland  
Troy Tanner  
Mark Uretsky

**International Reporting Requirements, IB Dkt. No. 04-112,  
International Settlements Policy Reform, IB Dkt. No. 11-80,  
Foreign Ownership Policies, IB Dkt. No. 11-133**

**Reporting Requirements**

- The proposed streamlining will modernize the reports and eliminate unnecessary reporting burdens
- Reporting requirements should be expanded as proposed in the NPRM to allow these reports to fulfill their intended purposes
- However, the proposed May 1 filing date, the elimination of the revised report and the proposed 1% correction threshold would require the highly burdensome filing of numerous corrections to traffic and revenue reports
  - The Commission should retain the existing requirement for a revised report with a 5% correction threshold, or require the traffic and revenue report to be based on booked data including out of period adjustments
- The published report should include only industry data, consistent with the Commission's reporting practices for domestic non-dominant carriers

**ISP Reform**

- The proposed removal of the ISP on all routes other than Cuba will benefit the US public interest, as demonstrated by the success of this approach on the 165 routes which are already ISP-exempt
- The proposed improvements to competitive safeguards are necessary to protect US carriers and consumers against anticompetitive conduct by foreign carriers
- Rather than require the filing or notification of above-benchmark agreements, the Commission should continue to address high termination rates through its successful market-based enforcement policy

**Foreign Ownership Policies**

- Foreign ownership restrictions remain a significant entry barrier in many foreign markets
- The United States should lead by example in removing these restrictions, and the adoption of the Commission's streamlining proposals will be an important step in that process
- The Commission also should revise the 2004 Foreign Ownership Guidelines, which suggest that the United States does not follow its WTO commitments on the treatment of foreign indirect non-controlling interests, and may serve to undermine US efforts to remove foreign ownership restrictions in foreign countries